

1 SAMUEL A. WONG, SBN 217104
2 swong@aegislawfirm.com
3 KASHIF HAQUE, SBN 218672
4 khaque@aegislawfirm.com
5 JESSICA L. CAMPBELL, SBN 280626
6 jcampbell@aegislawfirm.com
7 ALEX J. VALLE, SBN 334263
8 avalle@aegislawfirm.com
9 AEGIS LAW FIRM, PC
10 9811 Irvine Center Drive, Suite 100
11 Irvine, CA 92618
12 Telephone: (949) 379-6250
13 Facsimile: (949) 379-6251

14 Attorneys for Plaintiff
15 ADRIANA MAGDALENA RAMOS

16 MICHAEL J. NADER, SBN 200425
17 michael.nader@ogletree.com
18 ALEXANDRA ASTERLIN, SBN 221286
19 alexandra.asterlin@ogletree.com
20 PAUL M. SMITH, SBN 306644
21 paul.smith@ogletree.com
22 OGLETREE, DEAKINS, NASH,
23 SMOAK & STEWART, P.C.
24 500 Capitol Mall, Suite 2500
25 Sacramento, CA 95814
26 Telephone: 916-840-3150
27 Facsimile: 916-840-3159

28 Attorneys for Defendant
ROADSAFE TRAFFIC SYSTEMS, INC.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO

ADRIANA MAGDALENA RAMOS,
individually and on behalf of all others similarly
situated,

Plaintiff,

vs.

ROADS开朗 TRAFFIC SYSTEMS, INC.; and
DOES 1 through 20, inclusive,

Defendants.

Case No. 2:23-CV-02085-KJM-CKD

**JOINT STIPULATION TO STAY ALL
PROCEEDINGS PENDING MEDIATION
AND ORDER**

Action Filed: 2/8/2023
Removal Filed: 9/22/23
Trial Date: None Set

1 **TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE**
2 **EASTERN DISTRICT OF CALIFORNIA, DEFENDANT ROADSIDE TRAFFIC**
3 **SYSTEMS, INC., AND TO ITS COUNSEL OF RECORD:**

4 **WHEREAS** Plaintiff ADRIANA MAGDALENA RAMOS (“Plaintiff”) filed this civil class
5 action for damages against Defendant ROADSIDE TRAFFIC SYSTEMS, INC. (“Defendant”)
6 (collectively, the “Parties”) on February 8, 2023;

7 **WHEREAS** Defendant removed this civil class action to federal court on September 22,
8 2023;

9 **WHEREAS** Plaintiff filed and the Parties have fully briefed Plaintiff’s Motion to Remand
10 this civil class action to state court, which is set to be heard on December 8, 2023.

11 **WHEREAS** Defendant filed and the Parties have fully briefed a Motion to Dismiss
12 Plaintiff’s First Amended Class Action Complaint, which is set to be heard on December 8, 2023.

13 **WHEREAS** the Parties to this Action agreed to mediate this matter with experienced
14 mediator, the Hon. Carl J. West (Ret.), on January 23, 2024 (the “Mediation Date”), the earliest date
15 on which the mediator is available.

16 **WHEREAS** the Parties desire to devote their resources to focus on potentially resolving this
17 matter in full at the mediation, and therefore, the Parties jointly request the Court to stay all
18 proceedings until after the Mediation Date. Courts have “broad discretion” to stay proceedings.
19 *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the
20 power inherent in every court to control the disposition of the causes on its docket with economy of
21 time and effort for itself, for counsel, and for litigants.” *Landis v. North Am. Co.*, 299 U.S. 248, 254
22 (1936); see also Fed. R. Civ. P. 1. The Parties agree that a stay will help secure the just and efficient
23 resolution of this proceeding.

24 **NOW THEREFORE IT IS HEREBY STIPULATED THAT:**

- 25 1. All proceedings in this matter (including the hearings on Defendant’s Motion to Dismiss
26 and Plaintiff’s Motion to Remand) be stayed in full until after the Mediation Date, to
27 provide the Parties with adequate time to resolve all issues on or shortly after the
28 Mediation Date. The Parties jointly request that the Court schedule a status conference at

1 least thirty (30) days after the Mediation Date of January 23, 2024.

- 2 2. The Parties jointly request the Court to preserve their respective rights in this action,
3 including any arguments in support of or defenses against Defendant's right to challenge
4 the pleadings and Plaintiff's right to file a remand motion.
5 3. All discovery shall be stayed during the period of the stay. The Parties have entered into
6 a detailed, written agreement on the dates and content of the informal, pre-mediation
7 exchange of data and documents necessary to conduct mediation.

8
9 **IT IS SO STIPULATED.**

10
11 DATED: November 21, 2023

AEGIS LAW FIRM, PC

12
13 By: /s/ Alex J. Valle
14 Samuel A. Wong
15 Kashif Haque
Jessica L. Campbell
Alex J. Valle

16 Attorneys for Plaintiff
17 ADRIANA MAGDALENA RAMOS

18 DATED: November 21, 2023

19 OGLETREE, DEAKINS, NASH,
20 SMOAK & STEWART, P.C.

21 By: /s/ Paul M. Smith
22 Michael J. Nader
Alexandra Asterlin
Paul M. Smith

23 Attorneys for Defendant
24 ROADS SAFE TRAFFIC SYSTEMS, INC.

ORDER

THIS COURT, having read and considered the Joint Stipulation to Stay All Proceedings Pending Mediation by, between and among Plaintiff ADRIANA MAGDALENA RAMOS and Defendant ROADSIDE TRAFFIC SYSTEMS, INC, and finding good cause therefor, orders as follows:

1. This action is stayed in its entirety, subject to the conditions set forth in the Parties' stipulation, until the Court convenes a status conference by videoconference on **March 14, 2024 at 2:30 p.m.** before the undersigned.
 2. All other dates currently pending and/or scheduled in this action are vacated and continued until after the status conference.

IT IS SO ORDERED.

DATED: November 27, 2023.

CHIEF UNITED STATES DISTRICT JUDGE